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#### **DOCKET NO. 51812**

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ISSUES RELATED TO THE STATE § OF DISASTER FOR THE

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PUBLIC UTILITY COMMISSION Y COMMISSION FILING CLEAK

FEBRUARY 2021 WINTER

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OF TEXAS

WEATHER EVENT

#### JOINT COMMENTS IN SUPPORT OF THE IMM RECOMMENDATIONS REGARDING ANCILLARY SERVICES

The following entities are rural electric cooperatives and municipally-owned utilities and in ERCOT: Central Texas Electric Cooperative, Inc., Fayette Electric Cooperative, Inc., the City of Boerne, the City of Bridgeport, the City of Cuero, the City of Farmersville, the City of Fredericksburg, the City of Granbury, the City of Lockhart, the City of Robstown Utility Systems, the City of Schulenburg, the City of Seguin, the City of Seymour, and the City of Weatherford.

Those cooperatives and cities support the ERCOT Independent Market Monitor ("IMM") recommendations regarding the calculations of the market prices for ancillary services. Those entities understand that the Commission has so far taken the position that energy prices should not be recalculated, despite the IMM's recommendations.

But the Commission has not yet decided whether the market prices for ancillary services should be recalculated, and therefore they wish to voice their support for Commission adoption of the IMM's recommendation regarding recalculating the ancillary services prices. There are not only the financial impacts from incorrect ancillary service prices, but there is also the need to restore confidence that the system works by actually correcting mistakes. Given the differences between the markets for energy and the markets for ancillary services, the ancillary service prices should still be corrected even though the energy prices have been left unchanged.

These cooperatives and cities appreciate the opportunity to provide these comments and respectfully request that the Commission adopt the IMM recommendations.

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